

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Civil Action No. 1:21-cv-00260-PB
	:	
LBRY, INC.,	:	
	:	
Defendant.	:	
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**DECLARATION OF RACHEL S. MECHANIC IN OPPOSITION TO
THE SECURITIES AND EXCHANGE COMMISSION’S MOTION TO
STRIKE OR PRECLUDE USE OF AMENDED REPORT OF LBRY’S EXPERT**

Pursuant to 28 U.S.C. § 1746, I, Rachel S. Mechanic, declare under penalty of perjury that the following is true and correct:

1. I am an attorney admitted to practice in the States of New York and New Jersey. I am a partner in the New York City office of Perkins Coie LLP and am admitted *pro hac vice* in this matter. I represent LBRY, Inc. (“LBRY”) in this action. I make this Declaration upon personal knowledge and, if called upon to testify, could and would testify competently hereto.

2. I respectfully submit this declaration in opposition to the Securities and Exchange Commission’s Motion to Strike or Preclude Use of Amended Report of LBRY’s Expert and to transmit true and correct copies of the following documents:

<u>Exhibit</u>	<u>Document Description</u>
1	Order, <i>SEC v. Ripple Labs, Inc.</i> , 20-cv-10832 (AT)(SN) (S.D.N.Y. Apr. 19, 2022), ECF Doc. No. 469
2	Excerpts from the Deposition Transcript of Dr. Boris Richard, dated March 30, 2022
3	LBRY’s Amended Responses and Objections to the Commission’s First Set of Interrogatories, dated April 5, 2022

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 29, 2022

Respectfully submitted,

/s/ Rachel S. Mechanic

Rachel S. Mechanic (*pro hac vice*)
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